



**OREGON PUBLIC UTILITY COMMISSION
(INTEROFFICE CORRESPONDENCE)**

DATE: October 20, 2015

TO: File through Bruce Hellebuyck 

FROM: Stephanie Yamada 

SUBJECT: FRONTIER COMMUNICATIONS NORTHWEST INC: (Docket No. PL 24/Advice No. 039SPL) Establishes a promotion for new or upgraded business broadband customers who subscribe to the OneVoice Nationwide bundle under a term plan.

I have reviewed this filing and recommend that an acknowledgement letter be sent. The filing went into effect on October 18, 2015, and was filed on October 15, 2015. During the promotional period from October 18, 2015, through January 15, 2016, new or upgraded business broadband customers who purchase the OneVoice Nationwide bundle at \$39.99 under a one or two year term would be guaranteed that price for the OneVoice Nationwide and their broadband service for the life of the account. Termination fees as described in the tariff would apply if the customer cancels before the end of the term. Two year term customers would have the broadband installation fees waived. Changes to the product services after January 15, 2016, including broadband speed upgrades/downgrades, would disqualify the Price for Life guarantee. All other terms and conditions of the services remain in effect.

Frontier OneVoice Bundled Service includes one flat rate business access line, a group of standard custom calling features, and flat rate Extended Area Service (EAS). Customers may also purchase a group of premium features for an additional \$9.99 per month.

The monthly rate for the OneVoice Bundled Service is \$44.99, and the company also offers a monthly rate of \$29.99 when it is subscribed to under a term agreement of one, two, or three years.

This filing represents an unusual type of promotion because, at first glance, the promotional price appears to be higher than the tariffed rate of \$29.99 when OneVoice is purchased under a term of one or two years. However, I conclude that the promotional offer of a permanent rate of \$39.99 per month for a one or two year term is a distinctly different offer from the tariffed offer of \$29.99 per month for a one, two, or three year term agreement. Therefore, under the advice of counsel, I conclude that this offer does not violate Oregon law.

Telecommunications utilities are allowed to promote the use of their services, under ORS 759.267, by offering a waiver of part or all of a recurring or nonrecurring charge, a redemption coupon, or a premium with the purchase of a service. In addition, under ORS 759.182, telecommunications utilities are allowed to file promotional rate schedules with the Commission that are concurrent with the effective date for promotion, but are required to price promotional services at prices that are not below the price that the service is sold to another carrier. Large telecommunications utilities, under OAR 860-026-0025, are prohibited from promoting any regulated service for more than 180 days in any 12-month period. This filing complies with these requirements.